

BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

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| IN THE MATTER OF ENFORCEMENT) | PDC CASE NO: 04-422 |
| ACTION AGAINST) | |
| Washington Independent Bankers PAC) | STIPULATION OF FACTS |
| Respondent.) | VIOLATIONS AND |
| _____) | PENALTY |

The Washington Independent Bankers PAC (WIB PAC) (Respondent) and the Public Disclosure Commission Staff (Staff) jointly submit this Stipulation of Facts, Violations and Penalty for Commission consideration in lieu of a full enforcement hearing before the Commission. The parties agree that, pursuant to RCW 42.17.360, the Commission has the authority to accept, decline, or to suggest modifications to this Stipulation. In the interest of avoiding further proceedings, the parties enter this Stipulation.

Facts

Both parties agree to the following facts:

1. The Washington Independent Bankers PAC (WIB PAC) is the political committee of the Washington Independent Community Bankers Association (WICBA) a Lakewood, Washington based association of independent community banks.
2. WIB PAC has been registered with the PDC since June 1996. Reports were filed until July 2000 when WIB PAC stopped reporting.
3. As a political committee, WIB PAC was required to file detailed reports of contributions received on PDC form C-3, and summary reports of contributions

received and expenditures made, including details of expenditure activities, on PDC form C-4 and its appropriate schedules.

4. On or around December 30, 2003, Brad Tower, the registered lobbyist for WICBA, contacted PDC staff and asked to schedule a meeting to discuss an apparent lapse in reporting by the association's political committee, WIB PAC. Mr. Tower explained that when he became the lobbyist for WICBA in November 2003, he discovered that required reports had not been filed by WIB PAC, and said WIB PAC wanted to come into compliance.
5. On January 8, 2004, John Collins, Executive Director of WICBA and Treasurer of WIB PAC, and Mr. Tower, the lobbyist for WICBA, came to Olympia and self-reported a lapse in reporting by WIB PAC. Mr. Collins filed all missing reports on January 8, 2004 following the meeting with PDC staff.
6. Mr. Collins acknowledged that, as a political committee, WIB PAC failed to timely file C-3 and C-4 reports reflecting contributions received totaling \$36,066 and expenditures made totaling \$12,575 for activities occurring between August 1, 2000 and November 30, 2003. Specifically, WIB PAC failed to timely file the following:
 - a. In 2000, three C-4 reports and six C-3 reports showing contributions received of \$6,015 and expenditures made (all contributions to candidates) totaling \$9,600;
 - b. In 2001, six C-4 reports and four C-3 reports showing contributions received of \$7,000 and expenditures made (all contributions to candidates) totaling \$1,600;

- c. In 2002, five C-4 reports and three C-3 reports showing contributions received of \$8,118 and expenditures made (all contributions to candidates) totaling \$1,375;
- d. In 2003, two C-4 reports and two C-3 reports showing contributions received of \$14,933.

The C-3 and C-4 reports were filed with PDC on January 8, 2004.

Violations

Respondent and Staff agree that based upon the facts stipulated above, the Respondent committed multiple violations of RCW 42.17.080 and 42.17.090 by failing to timely report contributions received and expenditures made (all expenditures were contributions to state legislative or statewide executive candidates) during 2000, 2001, 2002 and 2003.

Penalty

Respondent and Staff agree that based upon the facts and the agreement regarding violations of RCW 42.17 above, the Respondent accepts an assessed total civil penalty of three thousand five hundred dollars (\$3,500.00). One thousand dollars (\$1,000.00) will be suspended provided WIB PAC is not found in violation of any section of RCW 42.17 for two years from the date of entry of the Commission's Final Order in this matter.

The Respondent agrees to fully comply in good faith with all provisions of Chapter 42.17 RCW in the future.

Respectfully submitted this 24th day of February, 2004.

/s/

2/24/04

Vicki Rippie, Executive Director

Date

/s/

2/24/04

John Collins
President, WICBA
Treasurer, WIB PAC

Date

Stipulation of Facts, Violations and Penalty
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